

OFFICE OF  
GENERAL COUNSEL

June 19, 2018

2018 JUN 21 PM 3:07

Office of General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

Re: FUSE Washington Complaint

MUR # 7418

To Whom it May Concern:

I am writing to you today to inform you of a series of serious federal campaign finance violations committed by FUSE Washington. The apparent violations are outlined in the following pages and the document is signed and notarized at the end of the complaint.

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## FUSE WASHINGTON

### 1. PARTISAN INTENT

Spending and fundraising undertaken by the organization FUSE is for an explicitly partisan purpose.

FUSE has disclosed absolutely nothing in terms of fundraising and spending, putting them in gross violation of Federal Elections Commission rules. The exhibits below demonstrate the many ways in which this organization has spent and raised money, and how their lack of disclosure is in violation of the law.

Both FUSE's allies and employees have stated that FUSE's goal is to "Flip the 8<sup>th</sup>" – meaning to defeat Republicans in the 8<sup>th</sup> Congressional District and install a Democrat as the U.S. Representative in that seat. This is an explicitly partisan goal, which is incompatible with any claim that FUSE's activities are nonpartisan. This is demonstrated by Facebook posts by FUSE employee Vania Winters and by an allied group in Ellensburg, WA, within the 8<sup>th</sup> Congressional District.

In a blog post on their website, FUSE's employee Morgan Steele is described as the Campaign Manager for FUSE's "Reclaim the 8<sup>th</sup>" Campaign. This is similar to the "Flip the 8<sup>th</sup>" language used elsewhere by FUSE employees and is strongly linked with effort to elect a Democrat to the 8<sup>th</sup> Congressional seat. And language describing "flipping" or "reclaiming" the 8<sup>th</sup> Congressional District is an explicit statement of partisan intent.

In addition, the FUSE Facebook page has made very partisan posts related to the 5<sup>th</sup> Congressional District.

#### Ellensburg Indivisible

Closed Group

About

Discussion

Members

Events

Videos

Photos

Files

Shortcuts



Sheril Bechard

Admin · 6 hrs

Flipping the 8th is biggest race in 2018, as reported by Fuse. Dino is clone of gop and trump and no neighbor, family and friends deserve dino replacing reichert.

District 8 Indivisible teams are the fore runners in changing us to blue. Noise, showing up, courage, outrage and determination will win the day. Some EI members voice that rocking the boat will upset people in the county. Polite will win the day. Signs in yards are asking for trouble. EI needs to stop urging actions. Corner protests do no good. Suggestion for those with these attitudes—resign from Ellensburg Indivisible.

Indivisible grew out of outrage at obvious trump and gop agenda, starting on November 8, 2017. Women's March messengered to nation, loud and boisterous, we are mad as hell and we won't take it. Money does make our job challenging. Indivisible, EI and us need putting our voices and actions into talk the talk, walk the walk and elect candidate of your choice. Time, donations, cries for change and social empathy require YOU and Indivisible team work.

10044469711

## Our Take

Politicians who have unabashedly waved their NRA "A" rating as a badge of honor need to answer for their support the gun lobby's political agenda. As the Trump administration pushes to arm school teachers and refuses to advocate for safer gun laws, our children and communities are urging congressional leaders to have the political courage to side with victims of gun violence against the gun lobby.

There can be no doubt that if elected Dino Rossi will continue the status-quo Congressional Republicans have set up in choosing the National Rifle Association's money and the gun lobby over the safety of our communities. Voters in the 8th Congressional District deserve a responsive representative who listens and responds to voters from both sides of the aisle - not someone with Dino Rossi's track record on the issue of gun safety.

We're looking forward to supporting a progressive candidate who listens to every voter and genuinely cares about gun violence prevention.

*Margen Siegel, President of the Eighth Congressional District*

## Indivisible Wenatchee

Secret Group

About

Discussion

| Vania's post

Members

Events

Videos

Photos

Files

Joined ▾

✓ Notifications

Add Members

More



Vania Winters

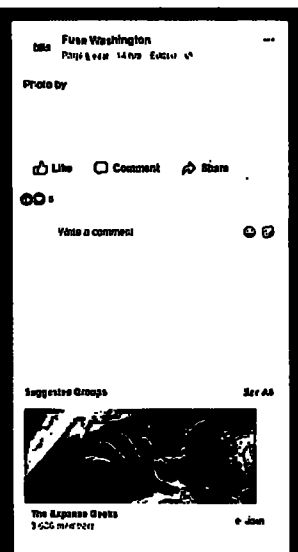
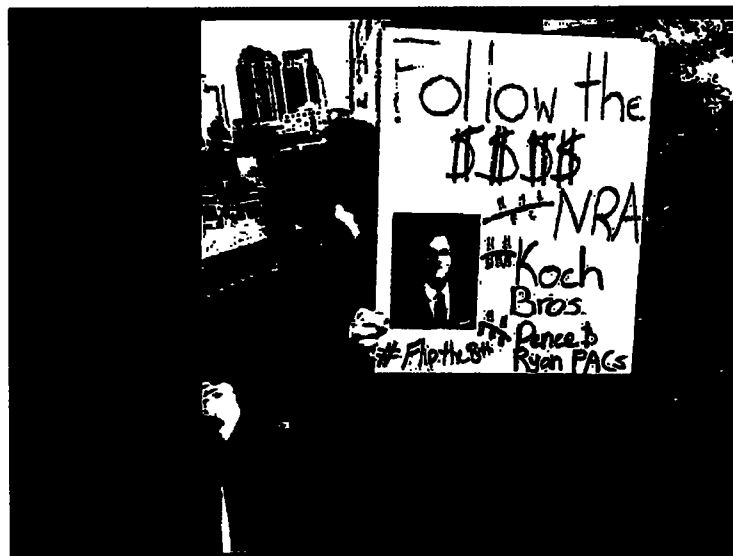
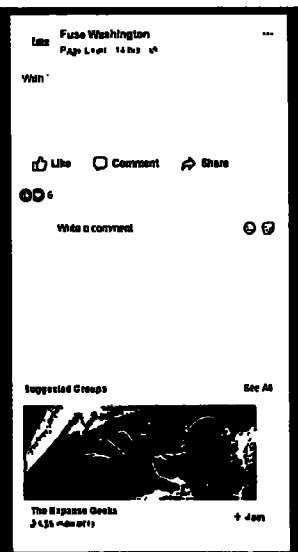
7 hrs

**VOLUNTEERS WANTED!!! FUSE will be at the Wen-Con Pop Culture Convention in Wenatchee at the Town Toyota Center this SATURDAY, APRIL 21 registering those youngsters to become active citizens.**

**We need to fill slots from 10am to 6pm.**

**Please, reply here or send me an email at [vania@fusewashington.org](mailto:vania@fusewashington.org) with your name, time(s) you can help, and a phone #.**

**THANKS FOR HELPING US FLIP THE 8TH!!!!**



**Fuse** **Fuse Washington**  
 April 11 at 10:38am · 📍

All your hard work is paying off! The rallies, canvasses, candidate forums, and letters to the editor are convincing voters across Eastern Washington that it's time for new leadership in congress!

# IT'S A REAL RACE

Poll shows  
 Democrat Lisa  
 Brown in striking  
 distance in race  
 with incumbent  
 Rep. Cathy  
 McMorris  
 Rodgers



Eastern Washington facing bruising race for Congress,  
 poll suggests

With Eastern Washington's 5th Congressional District split over the job President Donald Trump and Rep. Cathy McMorris Rodgers are doing, her 2018 race against...

SPOKESMAN.COM

👍 Like

💬 Comment

➦ Share



👤 292

Most Relevant ▼

1004746914

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[Content on page 2]

👍 Liked • 📢 Following • + Create Fundraiser

ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ

● **Saudi Ministry**

◆

I told Thank you!!!! 

**Nonprofit Organization in Seattle, Washington**  
 45:0314-4

**Fuse Washington**  
APR 12 2 42 PM '68

Don't think Republicans are scared yet? Paul Ryan's Super PAC reserved \$2 million of local TV ads to help Republican Dino Rossi. Let's keep building momentum to defeat Dino and elect new leadership in Congress!



## Congressional Leadership Fund Reserves \$48 Million in TV, Digital Ads

**Congressional Leadership Fund, the Super PAC signed with House GOP leadership is reserving \$38 million for TV ads and \$10 million for digital ads.**

50. (C) 1000

## Community

**See Also**

**11. Invite your friends to like this Page**

👉 23 074 people «like» this

22 341 people follow this

21 d 7 other friends like this

- Visit the group for info Page Pierce County  
Activist Council

## About

220 24

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**OPEN LISTED BY:**  
L. S. M. F. S.

**total 100****Pages linked by this Page**

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## 2. EXHIBITS OF SPENDING AND FUNDING

### A. HIRING A 8<sup>TH</sup> CONGRESSIONAL DISTRICT FIELD ORGANIZER

In and of itself, hiring a field organizer for a Congressional District is a strong indication that the intention of organizing is partisan, rather than a general effort to register voters. Why specifically this Congressional District? Is FUSE hiring similar roles for all other districts, including solid blue districts like Washington's 7<sup>th</sup> Congressional District?

But in addition to the hiring itself, part of the organizer's job description is to help "elect a progressive" and "Monitor Dino Rossi's campaign in the eastern part of the district and organize creative accountability efforts as appropriate" – an explicitly partisan effort to swing a Congressional election.

Ultimately, the field organizer that was hired is named Vania Winters, and announced herself in a Democrat-aligned Facebook group. She announced herself in Quarter 1 (March 31), and so any funds paid to her or raised to pay her should have been declared in Q1 reports.

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Click on a group's star icon to add it to your favorites

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GAIN Jobs via Jo...

Wellstone Jobs

soc culture, pakistan

Selenium Users

comp mail exchangers...

**Recent searches**

WA congressional...

washington state ...

washington congr...

**POSTING**

2 of 18

**Wellstone Jobs**

**Fuse Washington: CD 8 Organizer (Ellensburg/Wenatchee)**

1 post by 1 author

to...@fusewashington.org Jan 16

Do you love harnessing grassroots power to elect progressive champions? Do you love supporting activists to take power in communities? Do you want to be on the frontlines of organizing the resistance against Trump's agenda in Washington State? Are you passionate about racial equity and ready to work to make it a reality within the progressive community and our state? Are you excited about using innovative strategies to elect a progressive in the 8th Congressional District this year?

We are looking for a multi-talented campaign & community organizer to help make it happen in the eastern portion of the 8th CD (Wenatchee and Ellensburg specifically).

**JOB DESCRIPTION:**

Fuse is looking for an organizer based in Wenatchee or Ellensburg to organize volunteer leaders into a grassroots army that can register and turn out voters in the New American Majority. This is an opportunity to be a part of an ambitious plan to build grassroots power in a key Congressional swing district of WA in order to elect a progressive. Your mission will be to register and turn out voters of the Rising American Electorate by empowering self-organized Resistance groups to take action. The position has three main fields of responsibility: registering voters in the eastern part of the district, getting out the vote, and supporting local resistance groups like Indivisible.

**JOB RESPONSIBILITIES**

- Meet a weekly voter registration goal through individual registration efforts and by organizing volunteer registration days
- Lay the groundwork for voter registration at Central Washington University and the community colleges in the area
- Consult and support self-organized resistance groups like Indivisible in their grassroots efforts to build the base in Central WA
- Monitor Dino Rossi's campaign in the eastern part of the district and organize creative accountability actions as appropriate.
- Assess options for building bridges into geographic areas with concentrations of our targeted voters and potential voters
- Organize and support GOTV programs closer to the election

**QUALIFICATIONS:**

- 2-3 years of advanced community and campaign organizing experience: campus organizing or voter registration experience a plus
- Resident of or willing to move to Wenatchee, Ellensburg or the surrounding areas of Central WA
- Preference given to someone who has worked in communities of color and/or in rural Washington
- Spanish language skills preferred
- Passion for building power through political organizing and leadership development
- Demonstrated ability to organize volunteers into highly functioning teams
- Self-starter who's able to work in a fast paced, campaign style work environment with remote management
- Extraordinary people skills
- Innovative, creative, and data-driven
- Excels at working in teams and coalitions

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- Monitor Dino Rossi's campaign in the eastern part of the district and organize creative accountability actions as appropriate.
- Assess options for building bridges into geographic areas with concentrations of our targeted voters and potential voters
- Organize and support GOTV programs closer to the election
- Use Spanish language skills to build relationships and organize in partnership with the Latinx community of Central Washington
- Represent Fuse in the community as appropriate

**QUALIFICATIONS:**

- 2-3 years of advanced community and campaign organizing experience: campus organizing or voter registration experience a plus
- Resident of or willing to move to Wenatchee, Ellensburg or the surrounding areas of Central WA
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comp mail sudora...

Recent searches

WA congressional...

washington state ...

washington congr...

POST REPLY

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## COMPENSATION:

Salary ranges from \$32,000-35,000, depending on experience. Fuse offers excellent medical, dental, and vision benefits, as well as a retirement package with employer match and generous paid vacation and sick time.

## HOW TO APPLY

Send a resume, cover letter, and three references to jo...@fusewashington.org with the subject heading "8th CD Organizer - Central WA." We will consider applications as they arrive and no later than February 15, 2018.

This full-time position will start as soon as possible. Please send all questions regarding this position to Morgan Steele, mor...@fusewashington.org. Please no phone calls or drop-in visits.

Fuse Washington is an equal opportunity employer. We value a diverse workforce and an inclusive culture. All interested individuals, including people of color, women, persons with disabilities and persons who are lesbian, gay, bisexual, transgender or intersex, are particularly urged to apply. Fuse Washington will provide reasonable accommodations for applicants with disabilities on request.

## ABOUT FUSE

Fuse Washington (www.fusewashington.org) is the state's largest progressive organization - people creating change online, on the ground, and on issues that matter. Our goal is to make sure progressives win more often. We want the kinds of electoral and policy wins that build strong families, a secure middle class, and a better future for our children.

Our work makes it possible to win important campaigns on critical issues - like defeating an ultra-conservative, homophobic, anti-environmental State Supreme Court Justice; electing a progressive majority in the state legislature; extending light rail to the Eastside; or closing a tax loophole for Wall Street Banks instead of cutting basic health care for children.

Visit a Fuse to Meet

## Indivisible Washington's 8th District

Closed Group

About

Discussion

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Like Reply 13h



Write a reply...



I'm looking forward to meeting everyone and helping flip the 8th

Like Reply 1d



Vania Winters Hello, all! I'm FUSE's Organizer for the 8th CD in Central WA.

Like Reply 1d



meeting! Welcome all! I can't wait to meet you at our next

Like Reply 1d



Hi all! Looking forward to meeting you! I am a mom, I'm currently serving my second term as school board director, and I'm running for the 5th LD State Representative Position 2 seat against Paul Graves.



Vania Winters Hello, all! I'm FUSE's Organizer for the 8th CD in Central WA.

Like Reply 2w



meeting!

Saturday, March 31, 2018 at 3:47pm our next

Like Reply 2w



1607474196717



## B. POTENTIAL POLLING

The leader of "Indivisible Wenatchee", a FUSE-aligned group, informed her group that FUSE had "tested a number of phrases with voters" regarding their messaging opposing Dino Rossi for Congress. This appears to be evidence that they conducted polling or focus groups with voters for the explicit purpose of opposing a candidate in a partisan federal race. Any money raised or spent for such a poll or focus group must be disclosed to the public.

## 16 Events

Events

Calendar

Birthdays

Discover

| Rossi Protest

Past

+ Create Event

## Jim Brunner on Twitter

\* @Koch\_Industries PAC donated \$10,000 to @DinoRossiWA in March. I have a feeling this will be mentioned by @washdems one or two or 400 times this year #waelex

TWITTER.COM

Like

Comment



Mine will simply be "Dinos Against Dino"

Like Reply 7h

1



Rossi - 3 time loser! Let's make it 4!

Like Reply 7h Edited

3



Fuse tested a number of phrases with voters. One that spoke to voters the best had to do with him putting "corporate interests over working families."

Like Reply 6h

4



Trump clone.

Like Reply 6h

1



So true.

Like Reply 6h

1



Thanks I think that idea will resonate further on our side of the mountains than guns/NRA support issue.

Like Reply 4h



I tend to agree.

Like Reply 4h

160474469618

### C. FACEBOOK ADVERTISING

FUSE Washington has spent money on Facebook advertisements, which is clearly demonstrated in the photo below, which marks the Facebook post as "Sponsored." The advertised post is extremely partisan and this is clearly an expenditure that should have been reported.

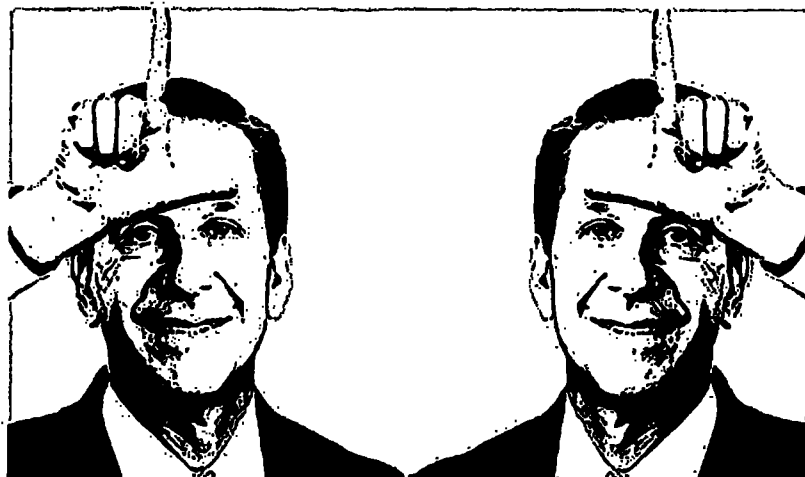


**Fuse Washington**

**Fuse**

Sponsored •

Republican Dino Rossi is Washington's biggest loser. Now he's running for Congress and hoping voters won't remember his sleazy business deals and extreme policy positions. It's clear that Rossi would be more of the same in D.C. We need new leadership in Congress that puts working families before the wealthy and corporations!



THESTRANGER.COM

#### **The Loser**

Dino Rossi is running for office again. Don't let him win.

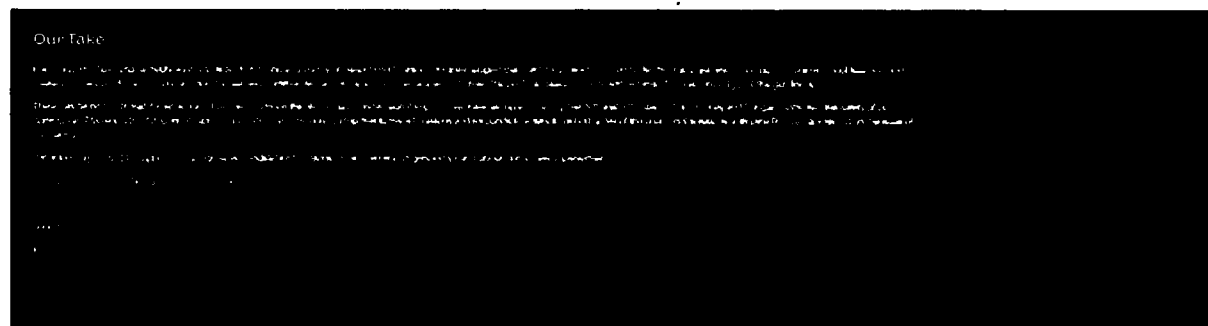
19044466719

### 3. SUMMARY

FUSE has completely failed to disclose any of its fundraising or spending on polling, staffing, advertising, and other expenses in its attempt to support Democrats for a partisan office. As the below screenshot demonstrates, FUSE has no disclaimer or other FEC committee name attached to its spending on its website.

FUSE's reliance on so-called "dark money" and failure to report its donors and expenditures in this effort is a major violation of U.S. campaign finance law. No FEC filings have appeared for FUSE, and it appears that they have channeled thousands of dollars in polling, salaries, and other unknown costs into Washington's 8<sup>th</sup> Congressional District without any intention of informing the public about it.

This is an egregious violation of federal law, and as a long-standing organization, FUSE has no excuse. FUSE is well aware of all federal campaign finance laws, they simply chose to ignore these laws in an attempt to hide their electioneering activities from public scrutiny. Whether this was because they're embarrassed about their donors' identities, afraid of admitting that they are a Seattle-centric organization attempting to impose their values on the rest of Washington state, or simply because they didn't feel like playing by the rules, they have committed multiple illegal acts in an attempt to unlawfully influence a federal election.



**Fuse**  
WASHINGTON

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1002 Third Avenue, Suite 1000, Seattle, WA 98101



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Respectfully submitted,

Dennis Olson  
6830 NE Bothell Way, Suite C-426  
Kenmore, WA 98028

Signed and sworn to before me this 19<sup>th</sup> day of June, 2018.

Notary Public

